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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of:

Order Instituting Informational Proceeding on a Greenhouse Gas Emissions Cap

Docket 07-OIIP-01

**COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON THE TYPE AND POINT OF REGULATION ISSUES**

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**COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON THE TYPE AND POINT OF REGULATION ISSUES**

In accordance with the Rules of Practice and Procedure of the Public Utilities Commission (“CPUC”) of the State of California, the California Municipal Utilities Association (“CMUA”) hereby files these Comments to questions posed in the *Administrative Law Judges’ Ruling Requesting Comments on Type and Point of Regulation Issues* (“ALJ Ruling”) issued November 9, 2007, in the R.06-04-009. CMUA also files these Comments with the California Energy Commission (“CEC”) in Docket 07-OIIP-01. In these Comments, the CPUC and CEC will collectively be called the “Joint Agencies.”

I. INTRODUCTION

CMUA represents California’s publicly owned electric utilities (“POUs”) serving approximately one-quarter of the electricity load in the state. All Comments in this filing represent the consensus position of CMUA’s members. These Comments are organized according to the outline used in the ALJ Ruling.

II. SELECTED COMMENTS

A. Section 3.3. [Retail Provider]-Based Cap and Trade

In the event that California implements a market-based system in furtherance of achieving the Assembly Bill 32 (“AB 32”) statewide greenhouse gas emissions limit,¹ CMUA believes that retail providers² should be the point of regulation. In the case of POUs, this means that AB 32 compliance obligations are the responsibility of the local regulatory authority. The retail provider is the proper point of regulation since it is best situated to manage its portfolio to meet the goals of AB 32, including decisions involving energy procurement, renewable portfolio standards, and energy efficiency. CMUA suggests that the term “retail provider-based” is actually more accurate than the term “load-based” as used in the ALJ Ruling. This term also clearly distinguishes the point of regulation concept from any issues related to allowance allocation schemes.³

¹ CAL. HEALTH & SAFETY CODE § 38570.

² In terms of reporting obligations, AB 32 applies to “retail sellers of electricity” which includes POUs, electrical corporations, electric service providers, and community choice aggregators serving end-use customers in California. CAL. HEALTH & SAFETY CODE § 38530(b)(2).

³ CMUA does not have a position on allowance allocations but does have a position on the point of regulation.

B. Question 5: How extensive do you view the threat of contract shuffling under a [retail provider]-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?

As of this date, the California Air Resources Board (“CARB”) has not adopted any regulations incorporating the Joint Agencies’ interpretations of contract shuffling. However, CMUA responds by stating that there is little threat of *actual* contract shuffling within a California-only retail provider-based program. Robust verification procedures will serve as an adequate deterrent to virtually eliminate *actual* contract shuffling by retail providers.

CMUA believes that the Joint Agencies hold to a clearly erroneous interpretation of AB 32 concerning the scope of authority granted to CARB.⁴ Based on their belief that CARB may regulate emissions beyond the definition of “statewide greenhouse gas emissions” as specified in AB 32, the Joint Agencies dispense several arbitrary and capricious recommendations for classifying a large range of wholesale sales within the rubric of “contract shuffling.” The Joint Agency recommendations shoulder retail providers with something akin to a presumption of guilt and/or strict liability offense by penalizing retail providers for selling power from owned / partially-owned high-GHG facilities. The Joint Agencies’ recommendations do not even include any procedural mechanism for a retail provider to overcome the “presumption” by providing evidence that demonstrates the *actual and verifiable* sources of power procured to serve its load.

C. Question 12: As the CPUC does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers, which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?

The nature of this question seems to imply that without further regulatory or legislative action, any greenhouse gas emission reduction requirement would be ineffectual as to POUs. A review of existing law confirms that POUs already possess the legal framework to adopt and enforce a variety of important policies, including energy efficiency, demand response, and emission reduction programs.

The source of authority for a POU to own and operate a utility is founded in the California Constitution and statutes, and then flows to the POU’s local regulatory authority. There are two predominate forms of POUs in California; (1) cities; and (2) special districts. A city is a municipal corporation formed primarily for the purpose of efficiently administering government and serving the general welfare of those

⁴ The ALJ Ruling asks that parties not repeat any comments filed previously in this proceeding. Therefore, CMUA incorporates by reference herein, all its comments filed in R.06-04-009 on the subject of “contract shuffling” as that term is used by the Joint Agencies.

inhabitants in the territory. Cities may be either Charter cities⁵ or General Law⁶ cities, but both have various enumerated powers. Special purpose districts are also common in California. The most prominent of these are Municipal Utility Districts,⁷ Public Utility Districts,⁸ and Irrigation Districts.⁹

The California Constitution grants the legislature the power to authorize a municipal corporation to own and operate an electric utility.¹⁰ Although, there is no uniform definition of a municipal corporation, the California courts have held that cities and both municipal and public utility districts fall within the definition of “municipal corporation” for the purposes of the California Constitution, Article XI, Section 9.¹¹ As such, both the Public Utilities Code and the Government Code provide that a municipal corporation may acquire, construct, own, operate, or lease an electric public utility.¹² California law also specifically authorizes irrigation districts to acquire, operate, lease and control electric utilities.

POUs have all the necessary legal authority to undertake their obligations to serve. A chief difference between POUs and private corporations providing utility functions is the manner in which that the functions are regulated. While private corporations are regulated by state agencies led by appointed commissioners, POUs are regulated by an elected local governing body. POUs are not defined as public utilities within Public Utilities Code Section 216 or California Constitution, Article XII, Section 3, and are generally exempt from CPUC regulation.¹³ Each type of POU has a statutory designation of the delegated power to own and operate a utility and the decision making power is within the purview of an elected governing body. Within this structure, considerable discretion is given to the governing body on matters of

⁵ Several examples of charter cities include Anaheim, Burbank, Roseville, and Los Angeles.

⁶ The City of Redding is an example of a general law city.

⁷ The Municipal Utility District Act (MUD Act) reads as follows: “A district may acquire, construct, own, operate, control, or use, within or without, or partly within or partly without, the district, works or parts of works for supplying the inhabitants of the district and public agencies therein, or some of them, with light, water, power, heat, . . . , and may do all things necessary or convenient to the full exercise of the powers herein.” CAL. PUB. UTIL. CODE §§ 11500, *et seq.*

⁸ *See* CAL. PUB. UTIL. CODE §§ 15501, *et seq.* “A district may acquire, construct, own, operate, control, or use, . . . , works for supplying its inhabitants with light, water, power, . . . , and may do all things necessary or convenient to the full exercise of the powers granted in this article. *Id.* at § 16461.

⁹ Under the Irrigation District Law, an irrigation district may purchase or lease electric power from any public or private entity and may acquire, operate, lease and control plants for the generation, transmission, distribution, sale and lease of electric power. CAL. WATER CODE § 22115.

¹⁰ CAL. CONST., art. XI, § 9. “A municipal corporation may establish, purchase, and operate public works to furnish its inhabitants with light, water, power, heat, transportation, or means of communication. It may furnish those services outside its boundaries, except within another municipal corporation which furnishes the same service and does not consent.” *Id.* § 9(a).

¹¹ *Glenbrook Development Co. v. City of Brea*, 253 Cal.App.2d 267, 275 (1967).

¹² CAL. PUB. UTIL. CODE § 10003 (stating that the power to acquire and operate a public utility includes the power to complete, reconstruct, extend, change, enlarge, and repair a public utility acquired, constructed, owned, or operated by a municipality).

¹³ *See County of Inyo v. PUC*, 26 Cal.3d 154 (1980). “Established doctrine declares that, ‘In the absence of legislation otherwise providing, the Commission’s jurisdiction to regulate public utilities extends only to the regulation of privately owned utilities.’” *Id.* at 166 *quoting Los Angeles Met. Transit Authority v. Public Utilities Com.*, 52 Cal.2d 655, 661 (1959).

policy. Each POU's governing body has the power to regulate rates and practices relevant thereto. In addition to being regulated by the locally elected officials, POUs are directly regulated by the public through the ability of the electorate to qualify and subject issues to a vote.

It is inaccurate to assume that because POUs are regulated by their local governing boards, rather than some outside authority, that they operate without legal guidelines. In fact, the ordinances and regulations adopted by a municipal utility governing board are enforceable, and have been enforced by the courts. Relevantly, a POU may be compelled to serve when it fails or refuses to exercise its duties or supply services that it is obligated to provide.¹⁴ Actions of a POU's governing board are subject to judicial review and the courts will remedy decisions that are unreasonable.¹⁵

Given that they are locally regulated, the POUs' obligations are established by municipal codes, ordinances, tariffs, and regulations. These obligations, which legally bind the POU, define strategic goals, risk management, rates, resource adequacy, renewable portfolio standards, and a host of other policies relevant to providing reliable electric service. Several examples are set forth here.

- "The objectives of the [City of Anaheim] Electric Utility organization are to plan and carry out the development of the power resources of the City for the greatest benefit to the area and to the citizens of Anaheim. This includes providing dependable service without discrimination for the residents of the City of Anaheim to the fullest extent possible, consistent with overall sound business principles in planning, in financing, in construction of developments and in the operation and maintenance of the City's utility facilities. The accomplishments of these objectives will make the maximum benefits to the public realized. It is recognized that the City Council is the governing body of the City and that it provides the utility services to the citizens of Anaheim. Through the City Council's direction and guidance, the City's management and supervisory personnel are continually anticipating the electrical service and related needs of all the customers in the community and expect to be responsive to their needs and requirements." *City of Anaheim, Resolution No.: 71R-478 (Adopted: 10-26-71)*.
- "The [Los Angeles] Department [of Water & Power] will exercise reasonable diligence and care to furnish and deliver a continuous and sufficient supply of water or electric energy to the customer, and to avoid any shortage or interruption of delivery." *City of Los Angeles, Department of Water and Power Rules and Regulations, Rule 14*.
- "The Board of Water and Power Commissioners shall have the possession, management and control of all the electric energy rights, land, rights-of-way, sites, facilities and property used for generation, transportation, distribution and delivery of power for the benefit of the City, its inhabitants and its customers." *Los Angeles City Charter Section 672*.
- "The board shall have the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of

¹⁴ "Like a private corporation, it is the duty of the city to furnish without discrimination to all its inhabitants who apply therefor a supply of water upon such applicants complying with such reasonable rules and regulations as it may lawfully establish for the conduct of the business." *Nourse v. City of Los Angeles*, 25 Cal. App. 384, 385-386 (1914).

¹⁵ Upon review, courts will determine whether or not decisions related to rates and practices of a municipal utility governing body are unreasonable, unfair, or fraudulently or arbitrarily established. *American Microsystems, Inc. v. City of Santa Clara*, 137 Cal. App. 3d 1037, 1042 (1982).

the Water and Power Assets for Departmental Purposes.” *Los Angeles City Charter Section 675.*

In addition to these examples, there are numerous acts of the California Legislature recognizing the local authority by placing specific obligations on POU's to develop, adopt, and implement various policies. These policies are enforceable in law, and provide a mechanism for ensuring POU compliance. Pertinent examples are described below.

- Each POU is responsible for implementing a renewable portfolio standard. Public Utilities Code § 387(a) requires that “[e]ach governing body of a [POU] . . . , shall be responsible for implementing and enforcing a renewables portfolio standard that recognizes the intent of the Legislature to encourage renewable resources, while taking into consideration the effect of the standard on rates, reliability, and financial resources and the goal of environmental improvement.” Each POU is held accountable to its customers through an annual reporting process outlined in Public Utilities Code § 387(b). The report must include the: (1) expenditures of public goods funds collected pursuant to Section 385 for renewable energy resource development; (2) a description of programs, expenditures, and expected or actual results; (3) the POU’s resource mix by fuel type; and (4) the contribution of each type of renewable energy resource with separate categories for those fuels considered eligible renewable energy resources as defined by Public Utilities Code § 399.12.
- Each POU is responsible for planning to ensure resource adequacy. Public Utilities Code § 9620 reads that “[e]ach [POU] serving end-use customers, shall prudently plan for and procure resources that are adequate to meet its planning reserve margin and peak demand and operating reserves, sufficient to provide reliable electric service to its customers.” The objective target set by Section 9620 is that each POU set a minimum standard in its planning process as established by the minimum planning reserve and reliability criteria approved by the Board of Trustees of the Western Systems Coordinating Council or the Western Electricity Coordinating Council. Each POU is responsible to provide any information requested by the CEC to enable it to evaluate the POU’s progress in meeting the requirements of § 9620.
- Each POU is responsible for meeting its load in accordance with a “loading order” that prefers energy efficiency, demand response, and renewable generation before conventional generation. Public Utilities Code § 9615 states that each POU, “in procuring energy, shall first acquire all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.”¹⁶ Each POU must “report annually to its customers and to the [CEC], its investment in energy efficiency and demand reduction programs.”¹⁷ Similar to the annual report discussed above for each POU’s RPS, this report must include a “description of programs, expenditures, and expected and actual energy savings results.”¹⁸ Section 9615 requires that each POU shall identify all potentially achievable cost-effective electricity efficiency savings and establish annual targets for energy efficiency savings and demand reduction for the next 10-year period, and then report those targets to the CEC. The POU shall treat investments made to achieve energy efficiency savings and demand reduction targets as procurement investments.
- Each POU must provide certain load, forecast, and program data to the CEC as

¹⁶ CAL. PUB. UTIL. CODE § 9615(a).

¹⁷ *Id.* at § 9615(b).

¹⁸ *Id.*

requested. In April 2007, the CEC adopted comprehensive new data collection regulations. These regulations include reporting requirements for the information discussed above, i.e., resource adequacy, energy efficiency, and load forecasts.

- Each POU must consider the impacts of greenhouse gas emissions in all resource procurement decisions. In October 2007, CEC regulations were approved that implement the requirements of SB 1368 that establishes a greenhouse gas (“GHG”) emission performance standard (“EPS”) for long-term financial commitments in baseload generation. Pursuant to Health & Safety Code §§ 38500 et seq., CARB is charged with monitoring and regulating sources of statewide greenhouse gas emissions. Among other things, CARB shall adopt rules and regulations to achieve the maximum technologically feasible and cost-effective reduction in statewide greenhouse gas emissions.¹⁹ AB 32 specifically requires POUs that are retail providers to incorporate emission reduction plans into their operations going forward.
- Each POU must adopt, implement, and fund a solar initiative program by January 1, 2008. Public Utilities Code § 387.5 requires each POU that sells electricity at retail to adopt, implement, and fund a solar initiative program (“SIP”) for the purpose of investing in, and encouraging the increased installation of, residential and commercial solar energy systems.

D. Question 22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.

No. Regardless of which regulatory mechanism is implemented, the ultimate responsibility and obligation for reducing GHG emissions is properly within the purview of the retail providers.

E. Question 25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?

California should put its primary efforts into collaborating at the regional / national level in order to develop an effective program that spans both geographical and sector boundaries. CMUA believes that the most technologically feasible and cost-effective program will encompass as many aspects of the nation’s economy as possible. A determination of the “reasonable” waiting period cannot be made at this time. This determination will be an ongoing subject for review. If the CARB scoping plan includes activities for developing a market-based system over the next 4 years, CARB should reevaluate the status of regional / national plans no less than annually. The analysis should evaluate factors such as the type of plan (i.e., retail provider-based, source-based, etc.) and its expected starting date. In this way, California could anticipate the regulatory structure and ensure that if any California-only plan is adopted, it will be designed in a way that transitions smoothly into the regional / national plan. Under no circumstance should California implement its own cap and trade program before 2012.

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¹⁹ CAL. HEALTH & SAFETY CODE § 38560.

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III. CONCLUSION

CMUA asks the Joint Agencies to consider CMUA's comments as outlined above.

Dated: December 3, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'BM' or 'B. McLaughlin', written in a cursive style.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON THE TYPE AND POINT OF REGULATION ISSUES

on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 3rd day of December 2007, at Sacramento, California.

A handwritten signature in black ink, appearing to read "Vicki Ferguson", with a stylized flourish at the end.

Vicki Ferguson

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

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